

Daniel Johnson Jr. (Bar No. 57409)
Mario Moore (Bar No. 231644)
DAN JOHNSON LAW GROUP, LLP
400 Oyster Point Blvd., Suite 321
South San Francisco, CA 94080
Telephone: (415)604-4500
dan@danjohnsonlawgroup.com
mario@danjohnsonlawgroup.com

Harold V. Johnson (IL Bar No. 6188149)
BRINKS GILSON & LIONE
455 N. Cityfront Plaza Drive, Suite 3600
Chicago, IL 60611
Telephone: (312) 321-4200
hjohnson@brinksgilson.com
Appearance pro hac vice

Lyle B. Vander Schaaf (DC Bar No. 422380)
Fei Hu (DC Bar No. 1016150)
BRINKS GILSON & LIONE
1775 Pennsylvania Avenue, Suite 900
Washington, D.C. 20006
Telephone: (202) 296-8700
lvanderschaaf@brinksgilson.com
Appearance pro hac vice

Attorneys for Specially Appearing Defendant
Fujian Jinhua Integrated Circuit Co., Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MICRON TECHNOLOGY, INC.,

Plaintiff,

v.

UNITED MICROELECTRONICS
CORPORATION, FUJIAN JINHUA
INTEGRATED CIRCUIT CO.,
LTD., and DOES 1-10

Defendants.

Case No. 3:17-cv-6932-MMC

**DECLARATION OF JINFU ZHENG IN
SUPPORT OF DEFENDANT FUJIAN
JINHUA INTEGRATED CIRCUIT CO.,
LTD.'S OPPOSITION TO PLAINTIFF
MICRON TECHNOLOGY, INC.'S
MOTION TO LIFT STAY**

Judge: Honorable Maxine M. Chesney
Courtroom: 07, 19th Floor
Hearing Date: 1/8/2021
Hearing Time: 09:00 AM

I, Jinfu Zheng, hereby declare as follows:

1 1. I am over twenty-one (21) years of age. I am a citizen of the People's Republic of
2 China ("PRC" or "Mainland China"). I have personal knowledge of and am fully competent to
3 testify to the matters herein.

4 2. I am the Assistant President of Defendant Fujian Jinhua Integrated Circuit Co., Ltd.
5 ("Jinhua"). I offer this Declaration in support of Jinhua's Opposition to Plaintiff Micron
6 Technology, Inc.'s ("Micron") Motion to Lift Stay.

7 3. Jinhua has circulated a document hold notice internally to preserve all relevant
8 documents.

9 4. All the Jinhua document hold notice recipients have read and acknowledged receipt
10 of the hold notice and their evidence preservation responsibilities.

11 5. To the best of my knowledge, no evidence has been intentionally or inadvertently
12 destroyed.

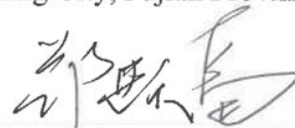
13 6. All of Jinhua's suppliers subjected to the Export Administration Regulations
14 ("EAR"), including Applied Materials, Inc., KLA-Tencor Corporation and Lam Research
15 Corporation, have ceased working with Jinhua since Jinhua was put on the "Entity List" on
16 October 30, 2018.

17 7. Jinhua has not received any research and development support from United Micro
18 electronics Corporation ("UMC") since October 31, 2018.

19 8. Jinhua has never transferred any information relating to its DRAM technology to
20 any third parties, including any Chinese government agencies or officials or any other Chinese
21 companies, including DRAM manufacturers, after October 30, 2018.

22 I declare under penalty of perjury under 28 U.S.C. § 1746 and the laws of the United States
23 that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 18th day of December, 2020 in Jinjiang City, Fujian Province, China.



JINFU ZHENG